

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

NEWELL BRANDS INC. and BRK  
BRANDS, INC.,

Defendants.

CIVIL ACTION NO. 6:21-cv-636-ADA

**JURY TRIAL DEMANDED**

AMERICAN PATENTS LLC,

Plaintiff,

v.

XEROX CORPORATION and DAHILL  
OFFICE TECHNOLOGY CORPORATION  
D/B/A XEROX BUSINESS SOLUTIONS  
SOUTHWEST,

Defendants.

CIVIL ACTION NO. 6:21-cv-638-ADA

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

The parties have conferred regarding submission of an agreed proposed Protective Order to protect certain information in the above-captioned cases. The parties jointly submit the agreed proposed Protective Order, which is attached as Exhibit A, and respectfully request its entry in the above-captioned cases.

Dated: January 13, 2022

Respectfully submitted,

/s/ Zachariah S. Harrington

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Dated: January 13, 2022

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Dated: January 13, 2022

/s/ Genevieve M. Halpenny

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of January, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Zachariah S. Harrington  
Zachariah S. Harrington

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with counsel for the defendants and they have consented to the filing of this as a joint motion.

/s/ Zachariah S. Harrington  
Zachariah S. Harrington